

Local Bankruptcy Form 9014-3

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : Chapter 13  
Patrick J. Lyons, : No. 17-12550-REF  
Debtor :  
\* \* \* \* \*

**NOTICE OF MOTION, RESPONSE DEADLINE**  
**AND HEARING DATE**

Members 1<sup>st</sup> Federal Credit Union has filed a Motion for Relief from Automatic Stay Pursuant to 11 U.S.C. Section 362 with regarding to Debtor's 2010 Nissan Frontier Crew Cab-V6 truck V.I.N. 1N6AD0ER3AC413043 (the "Collateral") in order to exercise its state law rights and remedies against the Collateral.

1. **Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney).**
2. **If you do not want the court to grant the relief sought in the Motion or if you want the court to consider your views on the Motion, then on or before **January 4, 2019, you or your attorney must file a response to the Motion.** (see Instructions on next page).**
3. **A hearing on the Motion is scheduled to be held on **Thursday, January 10, 2019 at 9:30 a.m.** before the Honorable Richard E. Fehling in Courtroom 1, United States Bankruptcy Court, The Madison Building, 400 Washington Street, Reading, Pennsylvania 19601.** Unless the court orders otherwise, the hearing on this contested matter will be an **evidentiary hearing.**
4. **If you do not file a response to the Motion, the court may cancel the hearing and enter an order granting the relief requested in the Motion.**
5. You may contact the Bankruptcy Clerk's office at 610-208-5040 to find out whether the hearing has been canceled because no one filed a response.
6. If a copy of the Motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney whose name and address is listed on the next page of this Notice.

**Filing Instructions**

7. **If you are required to file documents electronically by Local Bankruptcy Rule 5005-1,** you must file your response electronically.
8. **If you are not required to file electronically,** you must file your response at:  
  
400 Washington Street  
Reading, PA 19601
9. **If you mail your response** to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated in Paragraph 2 on the previous page of this Notice.
10. On the same day that you file or mail your Response to the Motion, you must mail or deliver a copy of the Response to the Movant's attorney:

Shawn M. Long, Esquire  
Barley Snyder  
126 East King Street  
Lancaster, PA 17602  
Telephone: (717) 299-5201  
Facsimile: (717) 291-4660  
slong@barley.com

Date: December 19, 2018